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September 12, 2014

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC ("**New GM**") in the above-referenced matter. We write to update the Court regarding developments in proceedings relating to New GM's Motions to Enforce, particularly with respect to developments in MDL 2543.

First, on September 10, 2014, pursuant to Judge Furman's Order No. 12 § III (attached hereto for the Court's convenience as Exhibit 1), counsel for New GM submitted a letter to Judge Furman regarding whether and to what extent discovery should proceed now on (i) personal injury claims involving post-Sale accidents and (ii) economic loss claims involving post-Sale New GM vehicles that are not subject to New GM's Motions to Enforce ("**New GM Discovery Letter**"). A copy of the New GM Discovery Letter is attached hereto as Exhibit 2.

Second, on September 12, 2014, pursuant to Judge Furman's Order No. 12 § III, Lead Counsel for the Plaintiffs submitted a letter to Judge Furman in response to the New GM Discovery Letter. A copy of Lead Counsel's letter is attached hereto as Exhibit 3.

Third, on September 12, 2014, pursuant to Judge Furman's Order No. 12 § IX, counsel for New GM, on behalf of all Defendants in MDL 2543, submitted a letter brief to Judge Furman

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regarding coordination of MDL 2543 with related cases in other state and federal courts. A copy of New GM's letter brief is attached hereto as Exhibit 4.

Fourth, on September 12, 2014, Lead Counsel submitted a letter brief to Judge Furman on MDL/Related Case Coordination. A copy of Lead Counsel's letter brief is attached hereto as Exhibit 5.

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd
Encl.

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